

METHFESSEL & WERBEL, ESQS.  
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Attorneys for BMS Catastrophe, Inc.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
HECTOR BETANCOURT

Plaintiff,

-AGAINST-

AMERICAN EXPRESS BANK, LTD.,  
AMERICAN EXPRESS COMPANY,  
AMERICAN EXPRESS TRAVEL  
RELATED SERVICES COMPANY, INC.,  
BANKERS TRUST COMPANY, BFP  
ONE LIBERTY PLAZA CO., L.P., BFP  
ONE LIBERTY PLAZA CO., LLC., BFP  
TOWER C CO. LLC., BFP TOWER C  
MM LLC., BLACKMON-MOORING-  
STEAMATIC CATASTOPHE, INC.  
D/B/A BMS CAT, et.al.

Defendants.

21 MC 102 (AKH)

INDEX NO.: 07cv4453

**NOTICE OF ADOPTION OF ANSWER  
TO MASTER COMPLAINT**

PLEASE TAKE NOTICE THAT Defendant, BMS Catastrophe, Inc. s/h/a Blackmon-Mooring-Steamatic Catastrophe, Inc. d/b/a BMS Catastrophe, by their attorneys, Methfessel & Werbel, as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopts their Answer and defenses to the Master Complaint, dated July 26, 2007, which was filed in the matter of: *In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH)*.

To the extent that Defendant's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above captioned matter, Defendant, Defendant, BMS Catastrophe, Inc., denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, the defendant, Defendant, BMS Catastrophe, Inc., demands judgment dismissing the above captioned action as against them, together with costs, disbursements and such other and further relief as this Court deems just and proper.

DATED: New York, New York  
September 19, 2007

**METHFESSEL & WERBEL, ESQS.**  
Attorneys for BMS Catastrophe



By: \_\_\_\_\_  
Frank J. Keenan (FK 8922)  
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(212) 947-1999

Our File No. 66200dd

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies as follows:

1. I am employed by the law firm of Methfessel & Werbel.
2. On September 11, 2007 the undersigned prepared and forwarded copies of the within Notice of Adoption , via ECF, to the following parties:

William J. Dubanevich, Esq.  
Worby Groner Edelman & Napoli Bern, LLP  
5 Broadway, 12th Floor  
New York, NY 10006  
Attorneys for: Hector Betancourt  
All Defense Counsel

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.



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Frank J. Keenan